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IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

IN AND FOR THE COUNTY OF MARICOPA

In re the Matter of: SHAWN TYLER FREEMAN, Petitioner, and ERIN ANNA GERLACH, Respondent.	Case No.: FC2022-094055 **EMERGENCY / EXPEDITED MOTION TO MODIFY TEMPORARY ORDERS (WITHOUT NOTICE)** (*Assigned to the Honorable Charlene Jackson*)

Respondent/Mother, ERIN ANNA GERLACH (hereinafter "Mother"), by undersigned counsel, respectfully requests the Court immediately modify the Temporary Orders entered February 14, 2023. Father has engaged in multiple and significant acts of domestic violence against Mother and BROOKLYN, even since the entry of the Court's Temporary Orders, which require immediate modification. Mother should be awarded sole legal decision-making and designated as BROOKLYN's primary residential parent in California. Father's parenting time should be suspended until a subsequent hearing can be held in this matter.

I. BACKGROUND FACTS

The parties have never been married. The parties have one (1) minor child in common, BROOKLYN FREEMAN, born February 12, 2018. BROOKLYN is five (5) years old. The parties physically separated in approximately August of 2022.

Since BROOKLYN's birth, Father has subjected both Mother and BROOKLYN to numerous significant acts of domestic violence. Father's domestic violence generally occurs after Father has been heavily drinking. Father is a police officer and owns several firearms. Upon information and belief, Father suffers from Post-Traumatic Stress Disorder. The parties' history of domestic violence includes, but is not necessarily limited to:

- On approximately September 21 or 22, 2018, Mother was pregnant with the parties' second child, a son. Father told Mother he wanted her to get an abortion. Mother refused. Father became enraged. He forced Mother to the ground and sat on top of her and forcibly shoved pills in Mother's mouth. Father then dragged Mother into the bathroom and forced a medical swab up Mother's vagina. Father broke the medical swab inside of Mother. Afterward, Father took Mother to the hospital but would not leave her side. Mother had no safe place to go. Father lied and told medical staff that Mother's medical incident was as a result of a botched abortion in California.

- On April 5, 2019, and on multiple occasions thereafter, Father allowed BROOKLYN to play with ammunition to his firearms. Father left BROOKLYN unattended with loaded firearms within her reach.
- On April 15, 2019, and on multiple occasions thereafter, Father lost his temper and started screaming and yelling. Father repeatedly told Mother to "get the f*** out" of the house. Mother locked her and BROOKLYN in a bathroom. Meanwhile, Father trashed and destroyed many of Mother and BROOKLYN's belongings.
- On April 21, 2019, Mother gave BROOKLYN finger paints and a large piece of paper to play with on the floor while Mother filled Easter eggs in another room. Father noticed that the finger paints were bleeding through the paper onto the tile floor. Father lost his temper. He grabbed Mother by the arm and dragged her into the living room where BROOKLYN was painting. When Mother told Father she did not think it was a big deal and that she would clean it up, Father slammed Mother onto the ground and pulled her across the floor by her hair. Father used Mother as a human mop to clean up the paint. BROOKLYN was hysterical. After this incident, Mother was missing patches of hair and was bruised on her arm. Mother's bruises from the incident lasted for several days. *See photographs attached hereto as "Exhibit A."* On multiple occasions, Father left bruises on Mother

after hitting, pushing, and/or grabbing her. *See photographs attached hereto as "Exhibit B."*

- On June 12, 2019, Father threw heavy objects at Mother and BROOKLYN from the kitchen. Some of the items hit BROOKLYN in the face, causing her lip to swell and bleed. *See photographs attached hereto as "Exhibit C."*
- On June 20, 2019, Father shoved Mother while she was holding BROOKLYN. BROOKLYN's head hit the corner / edge of the wall. Mother tried to get her phone to call 9-1-1. Father refused to give Mother her phone.
- On June 27, 2019, Mother was diagnosed with a brain injury from complications related to BROOKLYN's birth. Father became angry with Mother. Father told Mother he could not be with anyone who had a "syndrome." Father called Mother retarded.
- On July 14, 2019, Father was intoxicated and was being very loud, which caused BROOKLYN to wake up and begin crying in her crib. Father went into BROOKLYN's room and put a pillow over her face to make her stop crying. Mother rushed into BROOKLYN's room and pulled BROOKLYN from her crib. Mother locked her a BROOKLYN into a bathroom for safety. Father screamed at Mother from the other side of the door that she did not deserve to be a mother and that she should kill herself. Father again threw and trashed Mother and BROOKLYN's things. When Mother begged

Father to stop, Father told Mother to "get the f*** out." Father put a hole in the wall.

- On June 15, 2019, Father again became violent after drinking. Mother finally had enough courage and tried to confront Father. Father raised his fists to Mother. Mother said, "Touch me, I dare you." Father tackled Mother to the ground and kneeled on her back. Mother eventually passed out and woke up alone on the floor.
- On August 11, 2019, Father became upset and threw hot sausage at Mother while she was holding BROOKLYN. BROOKLYN did not have a shirt on and was hit with the hot food.
- On August 25, 2019, Father was passed out on the couch from drinking. Mother accidentally woke Father up while she was feeding BROOKLYN dinner. Father threw a level at Mother while Mother and BROOKLYN were in the kitchen. The level hit and cut Mother's leg, and just barely missed BROOKLYN.
- On September 3, 2019, Father grabbed Mother by the hair while she was holding BROOKLYN. Mother dropped BROOKLYN as Father dragged her down the floor. Mother screamed for help and grabbed BROOKLYN and ran out the front door.
- On September 10, 2019, Father became frustrated with BROOKLYN and hit her multiple times on her rear end. BROOKLYN was wearing a diaper.

However, Father hit BROOKLYN so hard that there was a red mark on her rear end for some time afterward. *See photographs attached hereto as "Exhibit D."*

- On December 9, 2019, Mother and Father were visiting Father's father in California. Father had been drinking. Mother went to take a shower. While Mother was in the shower, BROOKLYN squeezed out an entire tube of cream in the guest bedroom. Father lost his temper. Father told Mother to "get the f*** out." Father told Mother he was "beyond angry, uncontrollably angry" and that he had to get away from Mother. Mother tried to leave with BROOKLYN. Father pushed Mother while she was holding BROOKLYN. Her phone fell to the ground and Father stomped on it with his boots and cracked the screen. Father told Mother that this incident was her fault. Father told Mother that she forced him to hit her, shove her, and scream at her. This incident was reported to the Los Angeles County Sherriff's office.
- On December 29, 2019, Father instigated an argument with Mother while they were visiting Mother's family in California. Father was drunk and angry. Father had a gun in the bedroom he and Mother were staying in. Mother tried to leave the room with BROOKLYN, but Father grabbed Mother's hair and pulled her back into the bedroom. Mother got out into the hallway with BROOKLYN, where her family was standing and watching.

Mother tried to diffuse the situation. Mother went back into the room. Father picked up BROOKLYN was would not let her go. Mother family plead with Father to let BROOKLYN go. Ultimately, the Riverside County Sherriff's Office came and removed Father from Mother's parents' home.

- On April 14, 2020, Father became upset because he did not feel like Mother was appropriately helping with dinner. Father repeatedly slammed a plastic cutting board on the kitchen counter. It broke in several pieces. BROOKLYN was afraid and started crying.
- On April 24, 2020, Father held a pillow over Mother's face with his body weight on top of Mother. Mothe was dizzy and felt sick afterward. Father kicked Mother and BROOKLYN out of the house. Mother and BROOKLYN slept in a car in a hospital parking lot. Mother was afraid to get medical treatment because she did not want to get Father in trouble.
- On June 8, 2020, Father and Mother had a disagreement. Mother, Father, and BROOKLYN were outside in the front yard. Father's truck was parked in the driveway. Father said he was leaving. Mother took BROOKLYN into the house through the garage and closed the garage door. At the same time, Father unexpectedly drove his truck into the garage. The garage door closed on Father's truck. Father got out of his car and chased Mother into the house and screamed that he was going to kill her. Mother ran into the house while she was holding BROOKLYN. Father tackled Mother to the floor

and choked her. Father then went to check on the damage to the truck, which there was none. While Father was checking on his truck, Mother took BROOKLYN to a park to get away from Father.

- On October 25, 2020, Mother told Father she thought there might be termites in their home. While Mother was showing Father was she thought was evidence of the same, Father shoved her against a block wall fence and injured her arm.
- In 2021, the parties started to have consensual oral sex. However, Father was extremely intoxicated and started to become violent. Father choked Mother until she blacked out. When she woke up, she was bleeding from her throat. *See photographs attached hereto as "Exhibit E."*
- On July 28, 2022, BROOKLYN interrupted Father while he was playing Call of Duty. Father jumped out of his chair and said he was going to "beat her a**." Mother immediately got between Father and BROOKLYN. Father grabbed Mother by the hair and dragged her down to the ground. BROOKLYN started screaming hysterically and tried to pull Father off Mother. Father told BROOKLYN it was Mother's fault he was beating her because Mother would not listen. Mother told BROOKLYN to go to her room. After the incident, Mother went into BROOKLYN's room, where BROOKLYN was hiding under her toddler bed. Mother slept in BROOKLYN's room that night.

- On July 29, 2022, Father again was upset with Mother. Father pushed Mother in front of BROOKLYN. Father told BROOKLYN again that it was Mother's fault because she was not listening to Father.

On August 5, 2022, Mother moved with BROOKLYN to California to get away from Father's domestic violence. Since this date, Father has continued to commit domestic violence against Mother. Father has called Mother and has threatened her a BROOKLYN's safety. Father has called Mother from blocked numbers at all times during the night. Father has driven past the residence where he knew Mother and BROOKLYN were staying. Father even pretended to be another child on a game BROOKLYN was playing on her tablet. Father told BROOKLYN he was coming to get her and "not to tell mommy."

On February 15, 2023, just after the Court entered its Temporary Orders, Father called Mother from a blocked number screaming at her and calling her a "crazy c***." Father told Mother "suck my c*** you crazy b****." Father told Mother he was going to burn Mother's parents' house down unless she returned to Arizona. On this same date, Mother saw Father's dad's truck drive past her parents' house multiple times.

Approximately a month later, between approximately 12:30a.m. and 1:00a.m. in the early morning hours of March 16, 2023, Father sent Mother numerous nasty, explicit, and threatening text messages. Father stated as follows,

- "F*** off"
- "That's what happens when you know the judge you crazy c***"

- "There's nothing you can do about it"
- "Suck my d*** like she did"
- "Kidnapping b****"

Father then sent old photos of him standing in a bathroom naked with BROOKLYN when BROOKLYN was approximately 2 years old. Father is facing BROOKLYN with his penis exposed (these photos have been partially redacted for the sensitive images contained therein).

- "Kill yourself if you don't want to sit in jail. I'm ensuring you're going to prison for kidnapping MY CHILD. You were the vessel to birth her but you are not her mother. You don't deserve to be a mother. You are a piece of sh** excuse for a human being"
- "You f***ing b****"
- "Who do you think you are leaving Arizona? I have the power to lock you away and throw away the key. You think your pictures of bruises will get me arrested? I'll tell them you did it to yourself like the crazy b**** you are. I'll do what I want with Brooklyn. You can't do sh** to me. You are not her mother. You are a piece of sh**. I will hunt you down and when I do God help you. If you think what you reported is domestic abuse,? Keep reporting it, you'll find out what abuse is. I will f***ing kill you, you know I will. Give me my f***ing daughter NOW"

- I should've sliced your uterus out. You don't deserve more children. You are poisoning our race with your sh***y DNA producing f***ed up kids. You should have been an abortion"
- "You don't deserve to be alive"
- "You've poisoned my daughter. I'll have to beat the c*** out of her when I get her back. You'll never see her again. I'll ensure my child hates you. She will be provided with a real mother instead of a worthless whore. You belong 6 feet under with my piss spread on top."
- "Glad to see you're hiring the United nations of lawyers. Jew, Jap and a ni**er. You always been an equal opportunity whore."
- "Calculate your next move wisely. If I may make a suggestion it would be not to involve LE if you want to continue breathing freely without assistance."
- "You can wear my ring I had custom made for your worthless b**** finger or you can trade for my silver bracelets. You don't deserve sh** from me. You don't deserve a plastic band from a quarter machine. No man will ever want you. Your a fat useless slob. Nobody loves you not even my daughter. I was the only one who ever loved you. You didn't deserve me. You sh** on the only man who ever loved you when you didn't listen to me. Every other man will see you as the disgusting pathetic trash you are. I wouldn't allow a b**** like you to bring my son into this world. I wasn't raising no

pu**y piece of sh**. Do the world and my daughter a favor and go kill yourself. You are trash in society…"

See text messages attached hereto as "Exhibit F." As a result of these recent messages, there is currently an investigation against Father with the Pinal County Sherriff's Office. In addition, Child Protective Services in California is looking reviewing this matter as well.

III. LEGAL DECISION-MAKING AND PARENTING TIME

Given the significant history and significant domestic violence in this matter, Mother should be awarded sole legal decision-making authority. Mother should be designated as BROOKLYN's primary residential parent. "[J]oint legal decision-making *shall not* be awarded if the court makes a finding of the existence of domestic violence pursuant to section 13-3601 or of the court finds by a preponderance of the evidence that there has been a significant history of domestic violence." A.R.S. § 25-403.03(A) (emphasis added); *see also DeLuna v. Petitto*, 247 Ariz. 420, 423, ¶ 11 (App. 2019). Domestic violence under A.R.S. § 13-3601 includes, but is not necessarily limited to the following:

- **Endangerment** – when a person recklessly endangers another person with a substantial risk of imminent death or physical injury; A.R.S. 13-1201;
- **Threatening or intimidating** – when a person threatens by word or conduct to cause physical injury to another person or property of another person; A.R.S. § 13-1202(A)(1);
- **Assault** – when a person intentionally, knowingly, or recklessly causes physical injury to another person; or intentionally places another personal in

reasonable apprehension of imminent physical injury; or knowingly touches another person with the intent to injure, insult, or provoke that person; A.R.S. § 13-1203(A);

- **Aggravated assault** – when a person commits assault as described above, and causes serious physical injury to another, uses a deadly weapon or dangerous instrument, causes substantial impairment of any body organ or a fracture of any body part, commits the assault while the victim is physically restrained; or commits assault on a minor under fifteen years of age; A.R.S. § 13-1204;

- **Sexual assault** – when a person intentionally or knowingly engages in sexual intercourse or oral sexual contact with any person without the consent of such person; A.R.S. § 13-1406;

- **Disorderly conduct** – when a person engages in fighting, violent, or seriously disruptive behavior, when a person uses abusive or offensive language or gestures in a manner likely to provoke physical retaliation; or recklessly handles, displays, or discharges a deadly weapon or dangerous instrument; A.R.S. § 13-2904;

- **Use of electronic communication to terrify, intimidate, threaten, or harass a specific person** – when a person knowingly terrifies, intimidates, threatens, or harasses a person by directing obscene, lewd, or profane language, or suggesting any lewd or lascivious act in an electronic communication; or when a person threatens to inflict physical harm to a person or their property in an electronic communication; or when a person otherwise disturbs the peace of another person by sending repeated anonymous, unwanted or unsolicited electronic communications; A.R.S. § 13-2916(A);

- **Harassment** – when a person knowingly and repeatedly contacts a person through verbal, electronic, telephonic, or other means in a manner that harasses; or when a person follows or surveils another person; A.R.S. § 13-2921(A);

- **Child abuse** – when a person intentionally or knowingly causes serious and/or physical injury or sexual abuse or assault to a child; A.R.S. § 13-3623.

Furthermore, notwithstanding the foregoing, "[i]f the court determines that a parent…has committed *an act* of domestic violence against the other parent, there is a rebuttable presumption that an award of sole or joint legal decision-making to the parent who committed the act of domestic violence is contrary to the child's best interests. A.R.S. § 25-403.03(D). Pursuant to this subsection, domestic violence includes when a person:

- Intentionally, knowingly, or recklessly causes or attempts to cause sexual assaults or serious physical injury;
- Places a person in reasonable apprehension of imminent serious physical injury to any person;
- Engages in a pattern of behavior for which a court may issue an ex parte order to protect the other parent who is seeking child custody or to protect the child and the child's siblings.

A.R.S. § 25.403.03(D)(1)-(3). Evidence of domestic violence is contrary to a child's best interest. A.R.S. § 25-403.03(B). Furthermore, courts are directed to consider the safety and well-being of the child and the victim of domestic violence of *primary importance.* A.R.S. § 25-403.03(B) (emphasis added); *see also Hays v. Gama*, 205 Ariz. 99, 102, ¶ 18 (2003). In addition, where there is domestic violence, there is a rebuttable presumption against the perpetrator that parenting time will endanger the child and/or significantly impair the child's emotional development. A.R.S. § 25-403.03(F). Moreover, "[i]n determining whether the absence or relations of a parent shall be weighed against that

parent in determining legal decision-making or parenting time, the court may consider whether the absence or relocation was caused by an act of domestic violence by the other parent." A.R.S. § 25-403.03(I).

Here, Father has a significant history of committing significant acts of domestic violence against Mother and BROOKLYN. He repeatedly hit and beat Mother, leaving bruises and marks. He forcibly caused Mother to have an abortion by forcing a medical swab into Mother's vagina and breaking the same. Mother was hospitalized after the incident but Father lied to hospital staff and would not leave her while she was in the hospital so she could get help. Father has threatened, intimidated, and harassed Mother. Father has sexually assaulted Mother. Father has choked Mother. Father has repeatedly thrown Mother to the ground or dragged her by her hair. During the parties' relationship, Father repeatedly caused physical injury to BROOKLYN as well. Father threw things at Mother and BROOKLYN, hitting BROOKLYN and causing injuries to her face. Father tried to smother BROOKLYN with a pillow. Father has spanked BROOKLYN so hard that he left significant marks on BROOKYLN'S rear end.

Furthermore, after the entry of this Court's Temporary Orders, Father threatened that he was going to burn Mother's house down. Just this past week, Father sent Mother numerous text messages calling Mother a b****, a c***, and telling Mother to kill herself. Father told Mother that he "should've sliced [Mother's] uterus out" and that Mother "should have been an abortion." Father told Mother that she does not deserve to be alive. Father also threatened to kill Mother and threatened to beat the "c***" out of

BROOKLYN. Father told Mother "I'll do what I want with Brooklyn." Father even intimated that he forced BROOKLYN to perform sexual acts on Father. Father's history of domestic violence against Mother and BROOKLYN is significant. Mother and BROOKLYN require this Court's protection. Father's significant acts of domestic violence preclude this Court from awarding him legal decision-making or parenting time. If the Court does not enter immediate orders to protect Mother and BROOKLYN, irreparable injury will result to BROOKLYN and/or Mother. As such, Mother should be awarded sole legal decision-making and designated BROOKLYN's primary residential parent.

IV. CHILD SUPPORT

Child Support should be awarded pursuant to the Arizona Child Support Guidelines. Mother is not requesting an emergency order for child support. However, if after a hearing the Court modifies parenting time as requested herein, child support will need to be recalculated. Upon information and belief, based on the financial factors present in this case, Father would owe Mother child support in the amount of **$757.00** per month.

VI. ATTORNEY FEES AND COSTS

Mother is entitled to an award of pendente lite attorney fees in this matter pursuant to pursuant to:

- A.R.S. § 25-324, Financial resources and reasonableness of position.
- A.R.S. § 25-403.08, Resources and fees.

Pursuant to A.R.S. § 25-324 and A.R.S. § 25-403.08, after considering the relative financial resources of both parties, the Court may award attorney fees and costs incurred in maintaining or defending the proceedings. *White-Nathan v. Nathan*, 181 Ariz. 112, 120 (App. 1994). Further, the primary intent of A.R.S. § 25-324 is to assure a remedy for the party with the least ability to pay. *Gore v. Gore*, 169 Ariz. 593, 595 (App. 1991). Moreover, the purpose for awarding attorney fees during the litigation is to ensure that the party with the least resources has the ability to properly litigate issues before the Court. *Edsall v. Superior Court*, 143 Ariz. 240, 693 (1984).

As with child support, Mother is not seeking an *ex parte* order for attorney fees and costs. However, Mother seeks an interim award of fees be granted after both parties are heard on this Motion. In this instance, Father's monthly income is $6,364 per month, which is significantly more than Mother's monthly income of $0. Mother does not have the financial resources to be able to pay for her current expenses and pay for the cost of this litigation to adequately present her case. This is perfectly demonstrated by Mother's inability to retain counsel during the parties' Temporary Orders Hearing held in January of this year. Father has already gained the upper hand by being able to retain an attorney at the onset of this case. As such, Mother should be awarded her reasonable attorney fees and costs. Mother respectfully requests she be awarded $7,500 of interim attorney fees.

Furthermore, as the parties' income history indicates that the parties' respective incomes will not change in the near future, an award of fees is warranted. Pursuant to A.R.S. §25-403.08, in a proceeding regarding sole or joint legal decision-making or

parenting time, either party may request attorney fees, costs and expert witness fees to enable the party with insufficient resources to obtain adequate legal representation and to prepare evidence for the hearing. Accordingly, and due to the disparity in incomes, pursuant to the parties' earning potential, Mother is clearly the party with the least ability to pay, and as such, should be awarded her attorney fees and costs. *In re the Marriage of Pownall*, 197 Ariz. 577, 583 (App. 2000). As such, Mother should be awarded her attorney fees and costs.

Furthermore, Mother should be awarded her attorney fees and costs as a result of Father's unreasonable positions in this matter. Mother relocated to California with Brooklyn in August of 2022 in order to get away from Father's domestic violence. Mother has been traumatized by such violence and has not always acted rationally as a result of repeatedly being victimized by Father. Meanwhile, Father has used court systems and processes to abuse and manipulate Mother. As Father put it, "That's what happens when you know the judge…" Moreover, Father has continued to commit acts of domestic violence by threatening Mother and BROOKLYN. Mother should be awarded her attorney fees and costs as a result of Father's harassment.

WHEREFORE, Mother respectfully requests that the Court issue an order for the following, *pendente lite*:

A. Award Mother sole legal decision-making of BROOKLYN;

B. Designate Mother as BROOKLYN's primary residential parent and allow Mother and BROOKLYN to remain in California;

C. Suspend Father's parenting time until further order of the Court.

D. Order that Father pay child support to Mother in the amount of $757 per month;

E. Order that Father pay Mother an interim attorney fees and costs in the amount of $7,500;

H. For other and further relief as the Court deems just and appropriate under the circumstances.

RESPECTFULLY SUBMITTED this 20th day of March 2023.

/s/ Sally Colton

kdlaw, P.C.
Sally Colton
Mercado Center
8370 E. Via de Ventura Blvd., Suite K-100
Scottsdale, AZ 85258
Attorney for Respondent/Mother

COPY of the foregoing e-filed
this 20th day of March 2023 with:

THE CLERK OF THE COURT
Maricopa County Superior Court

THE HONORABLE CHARLENE JACKSON
Maricopa County Superior Court

COPY of the foregoing e-mailed
this 20th day of March 2023 to:

Caitlin Andrade
Novo Law Firm
3133 W. Frye Road, Suite 101
Chandler, AZ 85226
caitlin@novolawyers.com
Attorney for Petitioner

By: /s/ *SC*
SC

RULE 14 – WRITTEN AND UNSWORN DECLARATION

I declare under penalty of perjury that the foregoing is true and correct.

Dated: 3/20/23

Signature: _____

ERIN ANNA GERLACH

EXHIBIT

- A -

EXHIBIT

- B -

EXHIBIT

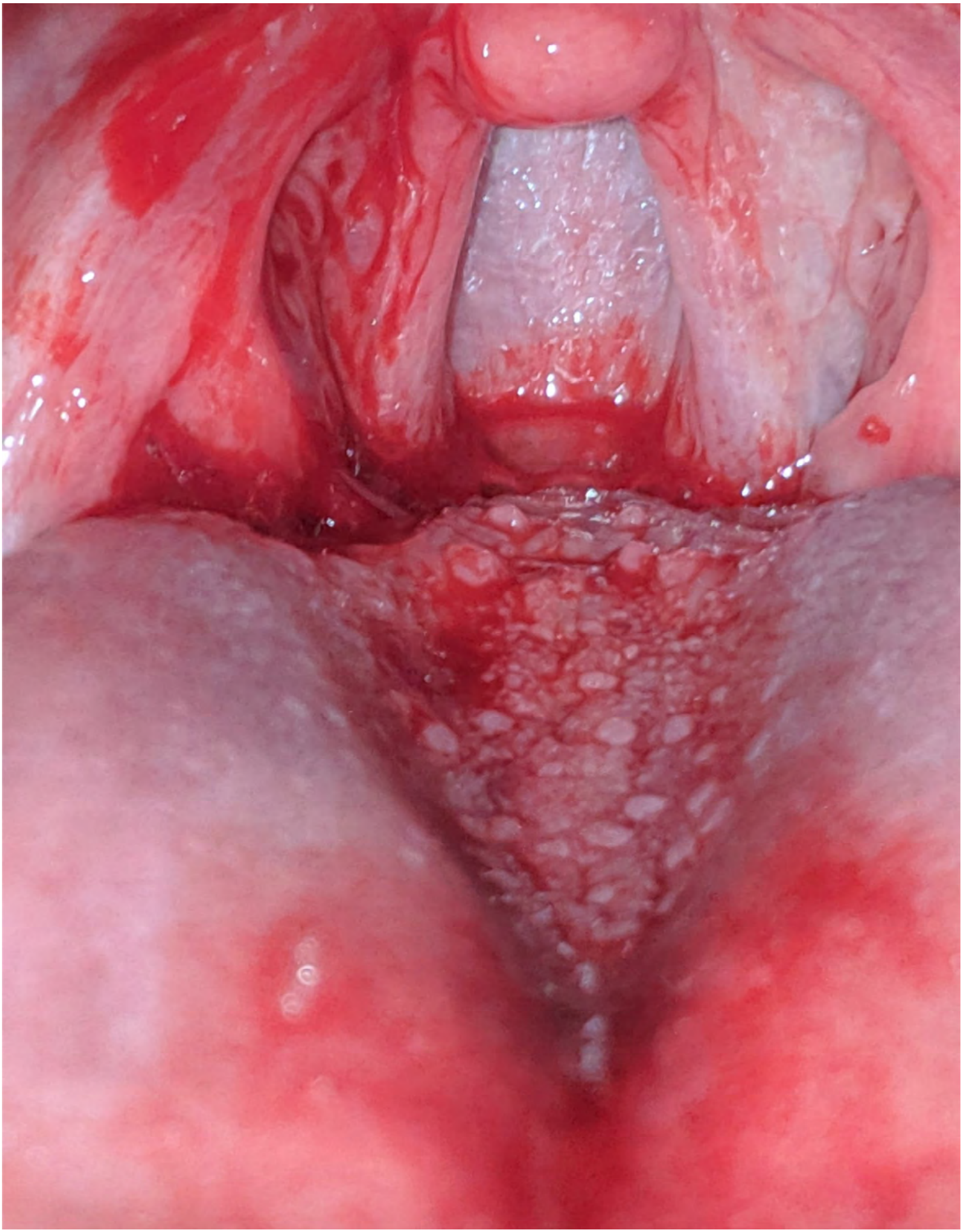
- C -

EXHIBIT

- D -

EXHIBIT

- E -



EXHIBIT

- F -

10:18 LTE

+1(480) 780-8937

Thursday 12:32 am

Fuck off

12:32 am

That's what happens when you know the judge you crazy cunt

12:33 am

There's nothing you can do about it

12:35 am

Suck my dick like she did

12:35 am

Kidnapping bitch

12:36 am

12:36 am

Type a message

10:20 LTE

+1(480) 780-8937

There's nothing you can do about it

12:35 am

Suck my dick like she did

12:35 am

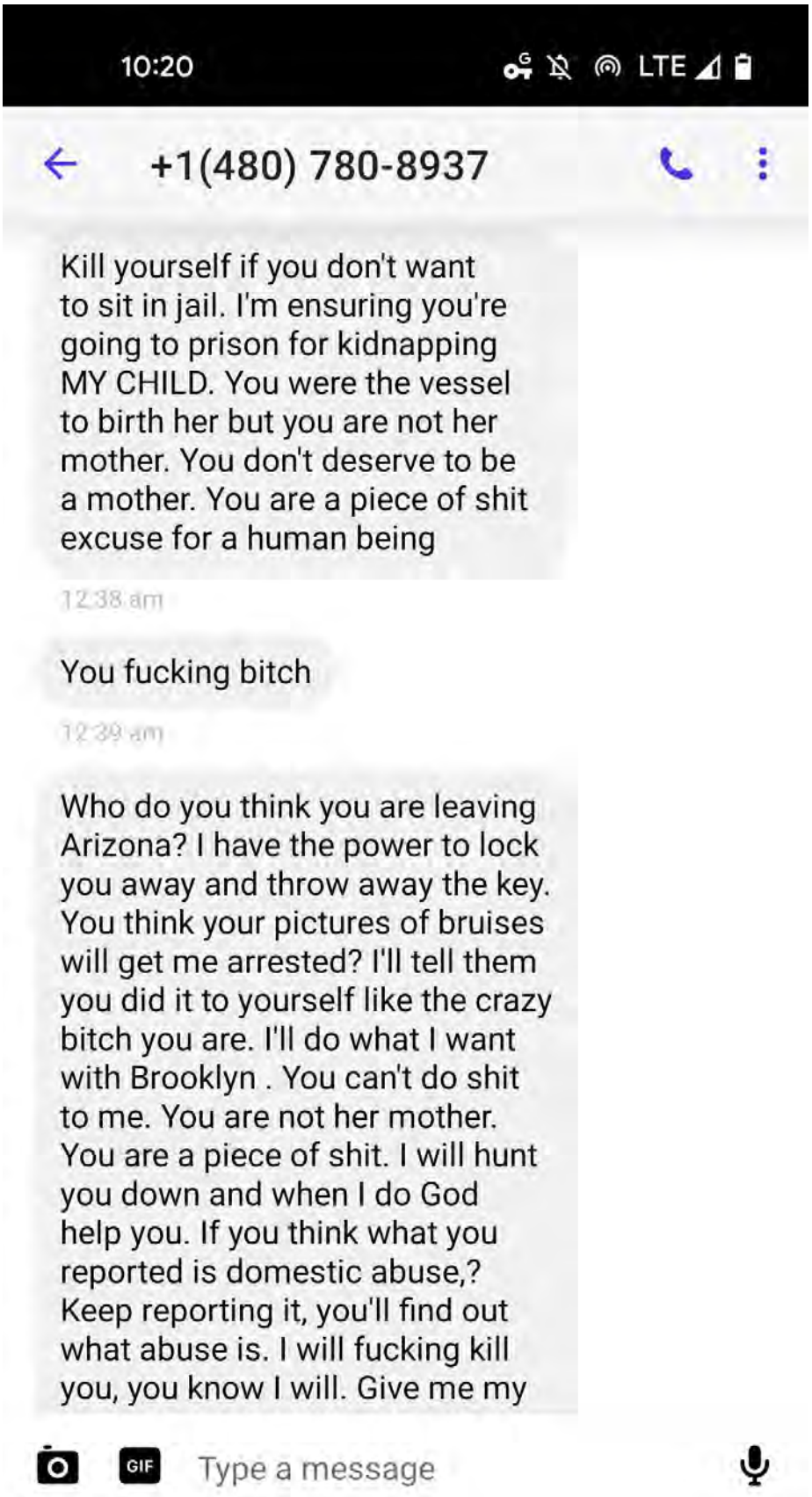
Kidnapping bitch

12:36 am

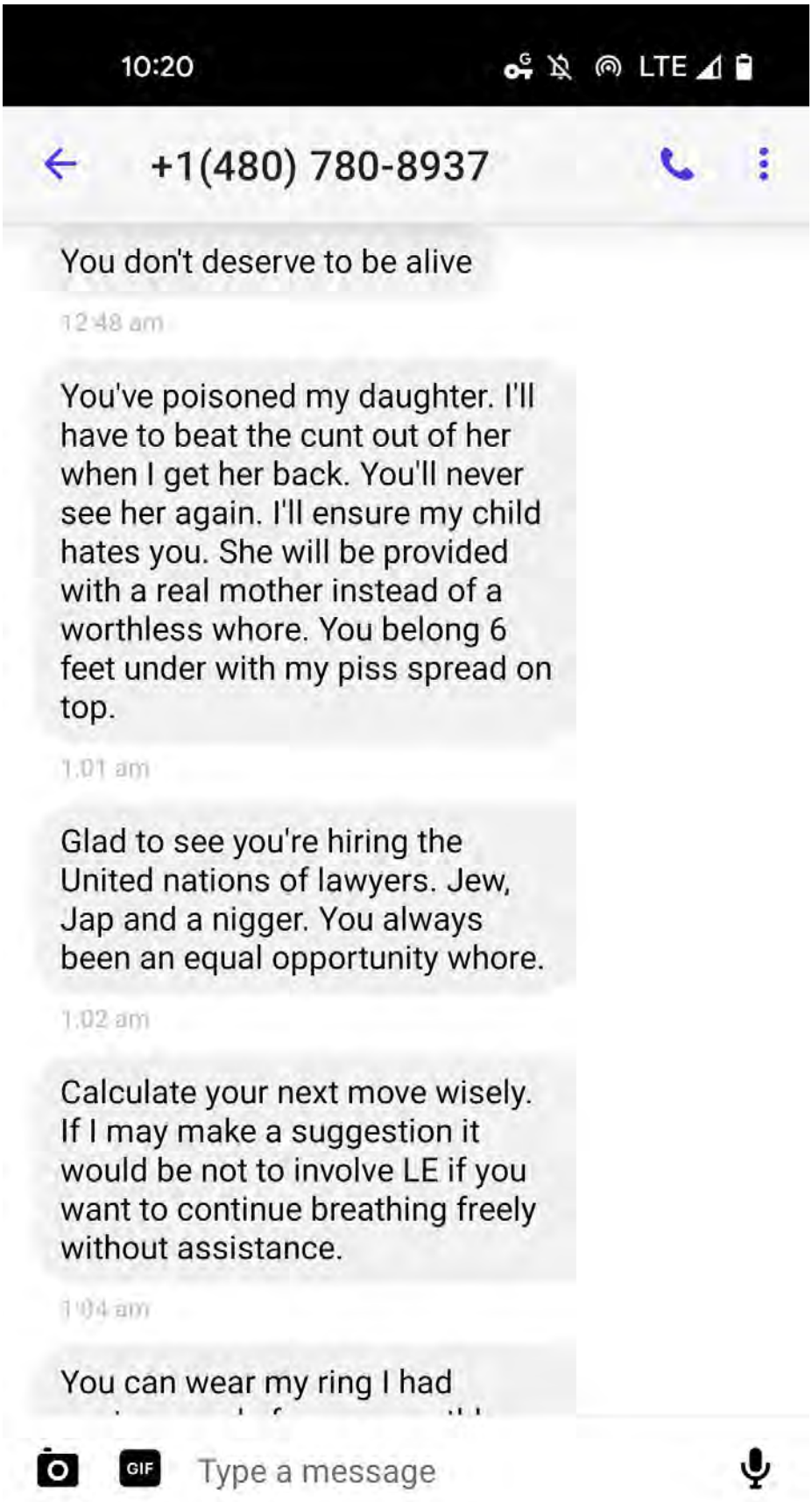
12:36 am

12:36 am

Type a message


10:20
LTE
+1(480) 780-8937
Kill yourself if you don't want to sit in jail. I'm ensuring you're going to prison for kidnapping MY CHILD. You were the vessel to birth her but you are not her mother. You don't deserve to be a mother. You are a piece of shit excuse for a human being
12:38 am
You fucking bitch
12:39 am
Who do you think you are leaving Arizona? I have the power to lock you away and throw away the key. You think your pictures of bruises will get me arrested? I'll tell them you did it to yourself like the crazy bitch you are. I'll do what I want with Brooklyn . You can't do shit to me. You are not her mother. You are a piece of shit. I will hunt you down and when I do God help you. If you think what you reported is domestic abuse,? Keep reporting it, you'll find out what abuse is. I will fucking kill you, you know I will. Give me my
GIF
Type a message

10:20
LTE
+1(480) 780-8937
Who do you think you are leaving Arizona? I have the power to lock you away and throw away the key. You think your pictures of bruises will get me arrested? I'll tell them you did it to yourself like the crazy bitch you are. I'll do what I want with Brooklyn . You can't do shit to me. You are not her mother. You are a piece of shit. I will hunt you down and when I do God help you. If you think what you reported is domestic abuse,? Keep reporting it, you'll find out what abuse is. I will fucking kill you, you know I will. Give me my fucking daughter NOW
12:44 am
I should've sliced your uterus out. You don't deserve more children. You are poisoning our race with your shitty DNA producing fucked up kids. You should have been an abortion
12:48 am
You don't deserve to be alive
12:48 am
GIF
Type a message


10:20
LTE
+1(480) 780-8937
You don't deserve to be alive
12:48 am
You've poisoned my daughter. I'll have to beat the cunt out of her when I get her back. You'll never see her again. I'll ensure my child hates you. She will be provided with a real mother instead of a worthless whore. You belong 6 feet under with my piss spread on top.
1:01 am
Glad to see you're hiring the United nations of lawyers. Jew, Jap and a nigger. You always been an equal opportunity whore.
1:02 am
Calculate your next move wisely. If I may make a suggestion it would be not to involve LE if you want to continue breathing freely without assistance.
1:04 am
You can wear my ring I had
GIF
Type a message

10:20
LTE
+1(480) 780-8937
Calculate your next move wisely. If I may make a suggestion it would be not to involve LE if you want to continue breathing freely without assistance.
1:04 am
You can wear my ring I had custom made for your worthless bitch finger or you can trade for my silver bracelets. You don't deserve shit from me. You don't deserve a plastic band from a quarter machine. No man will ever want you. Your a fat useless slob. Nobody loves you not even my daughter. I was the only one who ever loved you. You didn't deserve me. You shit on the only man who ever loved you when you didn't listen to me. Every other man will see you as the disgusting pathetic trash you are. I wouldn't allow a bitch like you to bring my son into this world. I wasn't raising no pussy piece of shit. Do the world and my daughter a favor go kill yourself. You are trash in society. I wouldn't let you lick the bottoms of my
GIF
Type a message

11:40
LTE
1 of 2
Thursday 12:36 am

11:39
LTE
2 of 2
Thursday 12:36 am